

**IN THE UNITED STATES BANKRUPTCY COURT FOR  
THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:

Jocelyn A Trombetta,  
Debtor.

Chapter 13

U.S. Bank National Association, as Trustee, successor  
in interest to Wilmington Trust Company, as Trustee,  
successor in interest to Bank of America National  
Association, as Trustee, successor by merger to LaSalle  
Bank National Association, as Trustee for LEHMAN  
XS TRUST MORTGAGE PASS-THROUGH  
CERTIFICATES, SERIES 2007-1,  
Movant,

Case No.: 19-15158-pmm

Hearing Date: July 10, 2024  
Time: 1:00 p.m.

vs.

Jocelyn A Trombetta,  
*Richard Trombetta, Co-Debtor,*  
Debtors / Respondents,

and

KENNETH E. WEST,  
Trustee / Respondent.

\* \* \* \* \*

**NOTICE OF MOTION, RESPONSE DEADLINE  
AND HEARING DATE**

U.S. Bank National Association, as Trustee, successor in interest to Wilmington Trust Company, as Trustee, successor in interest to Bank of America National Association, as Trustee, successor by merger to LaSalle Bank National Association, as Trustee for LEHMAN XS TRUST MORTGAGE PASS-THROUGH CERTIFICATES, SERIES 2007-1 has filed a Motion for Relief from the Automatic Stay and Co-Debtor Stay with the Court for leave to enforce its rights as determined by state and/or other applicable law with regard to real property.

**Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney).**

1. If you do not want the court to grant the relief sought in the motion or if you want the court to consider your views on the motion, then on or before **June 3, 2024** you or your attorney must do all of the following:

- (a) file an answer explaining your position at:

United States Bankruptcy Court  
Eastern District of Pennsylvania  
900 Market Street, Suite 400  
Philadelphia, PA 19107

- (b) mail a copy to the Movant's attorney:

Roger Fay, Esquire  
Albertelli Law  
14000 Commerce Parkway, Suite H  
Mount Laurel, NJ 08054  
Phone No.: 856-724-1888  
Fax No.: 856-793-9130

- (c) mail a copy to the Chapter 13 Trustee:

KENNETH E. WEST  
Office of the Chapter 13 Standing Trustee  
1234 Market Street – Suite 1813  
Philadelphia, PA 19107

2. If you or your attorney do not take the steps described in paragraphs 1(a), 1(b) and 1(c) above and attend the hearing, the court may enter an order granting the relief requested in the Motion.

3. A hearing on the motion is scheduled to be held before the Honorable Patricia M. Mayer on **July 10, 2024 at 1:00 p.m.** in Courtroom #1 of the Robert N.C. Nix, Sr. Federal Courthouse, 900 Market Street, Philadelphia, PA 19107.

4. If a copy of the Motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorney named in paragraph 1(b).

5. You may contact the Bankruptcy Clerk's office at (215) 408-2800 to find out whether the hearing has been cancelled because no one filed an answer to the Motion.

Respectfully submitted,  
ALBERTELLI LAW

DATED: May 17, 2024

/s/ Roger Fay, Esq., ID No. 315987  
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Attorneys for Movant